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Submitted: 12/28/2011 at 20:33:32

File Number: 0005007890

12-17

FCC 601 Main Form

FCC Application for Radio Service Authorization: Wireless Telecommunications Bureau Public Safety and Homeland Security Bureau

Approved by OMB 3060 - 0798 See instructions for public burden estimate

1) Radio Service Code:	1a) Existing Radio Service Code:
IG	

2)	(Select only one) (MD)			
,	NE - New RO - Renewal Only AU - Administrative Update NT - Required Not	for Extension of Time		
3a)	If this application is for a <u>D</u> evelopmental License, De <u>m</u> onstration License, or a <u>S</u> pecial Temporary Authorization (STA), enter the code and attach the required exhibit as described in the instructions. Otherwise enter 'N' (Not Applicable).	(N) <u>D M S N</u> /A		
3b)	If this application is for Special Temporary Authority due to an emergency situation, enter 'Y'; otherwise enter 'N'. Refer to Rule 1.915 for an explanation of situations considered to be an emergency.	(<u>)Y</u> es <u>N</u> o		
4)	If this application is for an Amendment or Withdrawal, enter the file number of the pending application currently on file with the FCC.	File Number		
5)	Call Sign WQFW336			
6)	MM DD			
7)	Is this application "major" as defined in §1.929 of the Commission's Rules when read in conjunction with the applicable radio service rules found in Parts 22 and 90 of the Commission's Rules? (NOTE: This question only applies to certain site-specific applications. See the instructions for applicability and full text of §1.929).	(Y) <u>Y</u> es <u>N</u> o		
8)	Are attachments (other than associated schedules) being filed with this application?	(Y) <u>Y</u> es <u>N</u> o		
ees	Waivers, and Exemptions			
9) l	s the Applicant exempt from FCC application fees?	(N) <u>Y</u> es <u>N</u> o		
10)	Is the Applicant exempt from FCC regulatory fees?	(N) <u>Y</u> es <u>N</u> o		
11a) Does this application include a request for a Waiver of the Commission's Rule(s)? If 'Yes', attach an exhibit providing rule number(s) and explaining circumstances.	(Y)Yes No		
11b) If 11a is 'Y', enter the number of rule sections involved.	Number of Rule Section(s): 1		
12)	Are the frequencies or parameters requested in this filing covered by grandfathered privileges, previously approved by waiver, or functionally integrated with an existing station?	(N)Yes No		

Applicant Information								
13) FCC Registration Number (FRN): 0015495773								
14) Applicant/Licensee legal entity type: (Select One) Individual Corporation	Uninco	orpora	ited Ass	ociation	Trust		Governm	nent Entity
Consortium General Partnership	Limite	d Liab	ility Cor	npany	Limited L	iability Pa	rtnership	
Limited Partnership Other (Description of	Legal Fr	ntity)						
If the licensee name is being updated, is the update to another party and for which proper Commissi provided?	te a resi	ult from)Yes No
16) First Name (if individual):	1	MI:	Last N	ame:			Suffix	9 .
17) Legal Entity Name (if other than individual):								
AMERICAN TIME & SIGNAL CO.								
18) Attention To:								
MANAGER								
19) P.O. Box:	And/Or	20) Street	Address:				
707								
21) City:					22) State:	23)	Zip Code:	
DASSEL					MN	5	5325	
24) Telephone Number:				25) FAX:		-		
(320)275-2101				(320)275-2603				
26) E-Mail Address:								
licensing@atsclock.com								
27) Demographics (Optional):								
27) Demographics (Optional): Race:	Ethni	city:				Sender:		
American Indian or Alaska Native			or Latir	10	lc	7 Male		
Asian	IV No	t Hisp	anic or	Latino	-	_ ☐ Female)	
☐ Black or African-American	لكما				ا			
Native Hawaiian or Other Pacific Islander								
White								
Real Party in Interest								
28) Name of Real Party in Interest of Applicant (If differ applicant):	ent from	B		29) FCC Reg	istration Number (F	RN) of R	eal Party in Inte	erest:
Contact Information (If different from the applicant)								
30) First Name:		MI:	La	st Name:				Suffix:
JOHN				LACK				
31) Company Name:		-						
SPECTRUM LICENSE CONSULTANTS, INC	С							
32) Attention To:								
33) P.O. Box:	And	34)	Street A	ddress:				
703815	/Or	F	P.O. BO	X 703815				
35) City:	1			36) State	1		37) Zip Code:	
DALLAS				TX			75370	
38) Telephone Number:				39) FAX:			MANUFACTOR STATE OF THE PARTY O	
(972)248-2400				(972)248	3-2422			
40) E-Mail Address:								
spectrum@fcc-licensing.com			- 1					

Regulatory Status		
41) This filing is for authorization to provide or use the following type(s) of radio service offering (enter all that apply):		
()Common Carrier ()Non-Common Carrier (X)Private, internal communications ()Broadcast Services ()Ball	nd <u>M</u> ar	nager
Type of Radio Service		
42) This filing is for authorization to provide the following type(s) of radio service (choose all that apply):		
() <u>Fixed</u> (<u>X)Mobile</u> () <u>Radiolocation</u> () <u>Satellite</u> (sound) () <u>Broadcast Servi</u>	ces	
43) Does the Applicant propose to provide service interconnected to the public telephone network? (N)	Yes 1	<u>N</u> o
Alien Ownership Questions (If any answer is 'Y', provide an attachment explaining the circumstances)		
	Yes I	<u>N</u> o
45) Is the Applicant an alien or the representative of an alien? (N	<u>)Y</u> es <u> </u>	<u>N</u> o
46) Is the Applicant a corporation organized under the laws of any foreign government?	Yes I	<u>N</u> o
47) Is the Applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	Yes I	<u>N</u> o
48a) Is the Applicant directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country?	<u>)Y</u> es	<u>N</u> o
48b) If the answer to 48a is 'Y', has the Applicant received a ruling(s) under Section 310(b)(4) of the Communications Act with respect to the same radio service involved in this application?	<u>)Y</u> es	<u>N</u> o
If the answer to 48b is 'Y', include in the exhibit required by Item 48a the citation(s) of the applicable declaratory ruling(s) by DA/FCC the FCC Record citation, if available, release date, and any other identifying information.	numbe	er of
If the answer to 48b is 'N', attach to this filing a date-stamped copy of a request for a foreign ownership ruling pursuant to Section 310 the Communications Act. It is not necessary to file a request for a foreign ownership ruling if the Applicant includes in the exhibit req Item 48a a showing that the requested license(s) is exempt from the provisions of Section 310(b)(4).	(b)(4) (uired t	of by
Basic Qualification Questions		
	<u>)Y</u> es	<u>N</u> o
50) Has the Applicant or any party to this application, or any party directly or indirectly controlling the Applicant, ever been convicted of a felony by any state or federal court?	<u>)Y</u> es	<u>N</u> o
51) Has any court finally adjudged the Applicant or any party directly or indirectly controlling the Applicant guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement, or any other means or unfair methods of competition?) <u>Y</u> es	<u>N</u> o
If the answer to any of 49-51 is 'Y', attach an exhibit explaining the circumstances.		
Aeronautical Advisory Station (Unicom) Certification		
52) () I certify that the station will be located on property of the airport to be served, and, in cases where the airport does not have a contower, RCO, or FAA flight service station, that I have notified the owner of the airport and all aviation service organizations located at the within ten days prior to application.		ort
Broadband Radio Service and Educational Broadband Service Cable Cross-Ownership		
53a) Will the requested facilities be used to provide multichannel video programming service? () <u>Y</u> es	No
53b) If the answer to question 53a is 'Y', does the Applicant operate, control or have an attributable interest (as defined in Section 27.1202 of the Commission's Rules) in a cable television system whose franchise area is located within the geographic service area of the requested facilities?) <u>Y</u> es	<u>N</u> o
Note: If the answer to question 53b is 'Y', attach an exhibit explaining how the Applicant complies with Section 27.1202 of the Commiss Rules or justifying a waiver of that rule. If a waiver of the Commission Rule(s) is being requested, Item 11a must be answered 'Y'.	ion's	
Broadband Radio Service and Educational Broadband Service (Part 27)		
) <u>Y</u> es	<u>N</u> o
Note: If the answer to item 54 is 'N', attach an exhibit explaining how the Applicant complies with Section 27.1203 of the Commission's Figure 11 and	Rules c	or
justifying a waiver of that rule. If a waiver of the Commission Rule(s) is being requested, Item 11a must be answered 'Y'. 55) (For BRS and EBS) Does the Applicant comply with Sections 27.50, 27.55, and 27.1221 of the Commission's Rules? () <u>Y</u> es	<u>N</u> o
Note: If the answer to item 55 is 'N', attach an exhibit justifying a waiver of that rule(s). If a waiver of the Commission Rule(s) is being relem 11a must be answered 'Y'.	queste	∌d,

General Certification Statements

- The applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application.
- 2) The applicant certifies that grant of this application would not cause the applicant to be in violation of any pertinent cross-ownership or attribution rules.*
 *If the applicant has sought a waiver of any such rule in connection with this application, it may make this certification subject to the outcome of the waiver request.
- 3) The applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.
- 4) The applicant certifies that neither the applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR § 1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification.
- 5) The applicant certifies that it either (1) has current required ownership data on file with the Commission, (2) is filing updated ownership data simultaneously with this application, or (3) is not required to file ownership data under the Commission's rules.
- 6) The applicant certifies that the facilities, operations, and transmitters for which this authorization is hereby requested are either: (1) categorically excluded from routine environmental evaluation for RF exposure as set forth in 47 C.F.R. 1.1307(b); or, (2) have been found not to cause human exposure to levels of radiofrequency radiation in excess of the limits specified in 47 C.F.R. 1.1310 and 2.1093; or, (3) are the subject of one or more Environmental Assessments filed with the Commission.
- 7) The applicant certifies that it has reviewed the appropriate Commission rules defining eligibility to hold the requested license(s), and is eligible to hold the requested license(s).
- 8) The applicant certifies that it is not in default on any payment for Commission licenses and that it is not delinquent on any non-tax debt owed to any federal agency

Signature

First Name:	MI:	Last Name:	Suffix:
JAMES		KOSKI	1.
57) Title:			-
ENGINEERING MANAGER			
			58) Date:

FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID.

Upon grant of this license application, the licensee may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in termination of the license. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of license requested in this application.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau 3060 - 0798 Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	<u>A</u> dd	<u>M</u> od <u>D</u> el	2) Location Number:	3			
Location Description: Mobile		4) Area of Operation P	on Code: 5) Location N		ə:		
6) FCC Antenna Structure Regis	tration # or	N/A (FAA Notification	not Required): N/A	de			
7) Latitude (DD-MM-SS.S): 29-42-43.6		NAD83 (N) N or S	8) Longitude (DDD-MM-SS.S): 095-24-00.2		NAD83 (W) <u>E</u> or <u>W</u>		
9) Street Address, Name of Land 6448 FANNIN ST	ding Area, o	or Other Location Desc	ription:				
10) City:		11) State:		12) County/Borou	ugh/Parish:		
HOUSTON		TX		HARRIS	1980-1980-1980 1980-1980-1980		
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL V Appurtenances (('b' in antenna si		15) Overall Ht AG Appurtenanc ('c' in antenn			
16) Support Structure Type:							
17) Location Number: (only for Area of Operation Code 'A')	18) Radiu 20.0	s (km):	19) Airport Identifier:	20) Si	ite Status:		
21) Maximum Latitude (DD-MM-S Use for rectangle only (Northwest		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longitude (DDD-MM-SS.S): NAD83 Use for rectangle only (Northwest corner) () <u>E</u> or <u>W</u>				
23) Do you propose to operate in	an area th	at requires frequency	coordination with Cana	ida?	(N) <u>Y</u> es <u>N</u> o		
24) Description: (only for Area of	Operation	Code 'O')					
25) Number of Units:	Hand Held	Mobile	_Temporary Fixed	Aircraft	Itinerant		
26) Would a Commission grant o environmental effect? See Se If 'Yes', submit an environme	ection 1.130	7 of 47 CFR.		25 25 22 25	(N) <u>Y</u> es <u>N</u> o		
27a) If the site is located in one of proper Quiet Zone entity was			7b of the Instructions, p	provide the date (mi	m/dd/yyyy) that the		
27b) Has the Applicant obtained specified in this application?		n consent from the pro	per Quiet Zone entity for	or the same technic	cal parameters that are () Yes No		
28) Do you propose to operate in	an area th	at requires frequency	coordination with Mexic	00?	() <u>Y</u> es <u>N</u> o		

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau 3060 - 0798 Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	<u>A</u> dd	<u>M</u> od <u>D</u> el	2) Location Number	r: 4		
3) Location Description: Mobile		4) Area of Operation Code:		5) Location Na	me:	
) FCC Antenna Structure Regis	stration # or	N/A (FAA Notificatio	n not Required):			
) Latitude (DD-MM-SS.S): 36-09-12.5		NAD83 (N) <u>N</u> or <u>S</u>	8) Longitude (DDD- 086-48-32.8	MM-SS.S):	NAD83 (W) <u>E</u> or <u>W</u>	
) Street Address, Name of Land 2216 MURPHY AVE	ding Area, o	or Other Location Des	scription:			
0) City: NASHVILLE		11) State: TN		12) County/Bo	right of a thropic research and the	
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):		15) Overall Ht AGL With Appurtenances (meters) ('c' in antenna structure example		
6) Support Structure Type:						
7) Location Number: (only for Area of Operation Code 'A')	a of 16.0		19) Airport Identifier: 20) Site		Site Status:	
Maximum Latitude (DD-MM- se for rectangle only (Northwest -		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longitude (DDD-MM-SS.S): NAD83 Use for rectangle only (Northwest corner) () E or !			
3) Do you propose to operate in	an area th	at requires frequency	coordination with Can	ada?	(N) Yes No	
4) Description: (only for Area of	Operation	Code 'O')				
5) Number of Units:	Hand Held	Mobile	Temporary Fixed	Aircraft	Itinerant	
6) Would a Commission grant of environmental effect? See So If 'Yes', submit an environme	ection 1.130	07 of 47 CFR.		7	(N) Yes No	
7a) If the site is located in one of proper Quiet Zone entity wa			27b of the Instructions,	provide the date (mm/dd/yyyy) that the	
7b) Has the Applicant obtained specified in this application		n consent from the pr	oper Quiet Zone entity	for the same tech	nical parameters that are () Yes No	
B) Do you propose to operate in	an area th	at requires frequency	coordination with Mex	ico?	() <u>Y</u> es <u>N</u> o	

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau 3060 - 0798 Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	<u>A</u> dd	<u>M</u> od <u>D</u> el	2) Location Number:	5		
3) Location Description:		4) Area of Operation	Code:	5) Location	n Name:	
Mobile		P				
6) FCC Antenna Structure Registr	ration # or	N/A (FAA Notification	not Required): N/A			
7) Latitude (DD-MM-SS.S): 40-44-42.2		NAD83 (N) N or S	8) Longitude (DDD-M 073-53-07.6	8) Longitude (DDD-MM-SS.S): 073-53-07.6		
9) Street Address, Name of Landi 79-01 BROADWAY	ng Area, o	or Other Location Desc	cription:			
10) City:		11) State:		12) County	//Borough/Parish:	
ELMHURST		NY		QUEE	NS	
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):		15) Overall Ht AGL With Appurtenances (meters) ('c' in antenna structure example		
16) Support Structure Type:						
17) Location Number: (only for Area of Operation Code 'A')	18) Radiu 14.0	is (km):	19) Airport Identifier; 20) Site Status:			
21) Maximum Latitude (DD-MM-S Use for rectangle only (Northwest c		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longitude (DDD-MM-SS.S): NAD83 Use for rectangle only (Northwest corner) () E or W			
23) Do you propose to operate in	an area th	at requires frequency	coordination with Cana	ida?	(N) <u>Y</u> es <u>N</u> o	
24) Description: (only for Area of Operation Code 'O')						
25) Number of Units:H	and Held	Mobile	Temporary Fixed	Aircraft	Itinerant	
26) Would a Commission grant of environmental effect? See Sec If 'Yes', submit an environment	ction 1.130 ntal assess	07 of 47 CFR. sment as required by 4	7 CFR, Sections 1.130	8 and 1.131	i.	
27a) If the site is located in one of proper Quiet Zone entity was			7b of the Instructions, p	provide the d	ate (mm/dd/yyyy) that the	
27b) Has the Applicant obtained p specified in this application?		n consent from the pro	per Quiet Zone entity f	or the same t	technical parameters that are () Yes No	
28) Do you propose to operate in	an area th	at requires frequency	coordination with Mexic	co?	() <u>Y</u> es <u>N</u> o	

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau 3060 - 0798 Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	1) Action Requested: (A) Add Mod Del 2)			2) Location Number: 6			
3) Location Description:		4) Area of Operation	Code:	5) Location Name:			
Mobile		P					
6) FCC Antenna Structure Regis	tration # or	N/A (FAA Notification	not Required): N/A				
7) Latitude (DD-MM-SS.S): 44-58-02.6		NAD83 (N) <u>N</u> or <u>S</u>	8) Longitude (DDD-N 093-14-13.2		NAD83 V) <u>E</u> or <u>W</u>		
9) Street Address, Name of Land 2414 S 7TH ST	ding Area, o	or Other Location Desc	ription:		i i		
10) City:		11) State:		12) County/Borough/Par	ish:		
MINNEAPOLIS		MN		HENNEPIN	NO. 1410.		
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):		15) Overall Ht AGL With Appurtenances (meters) ('c' in antenna structure example):			
16) Support Structure Type:							
17) Location Number: (only for Area of Operation Code 'A')	18) Radiu 12.0	s (km):	19) Airport Identifier:	20) Site Statu	us:		
21) Maximum Latitude (DD-MM-: Use for rectangle only (Northwest		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longitude (DDD-MM-SS.S): NAD83 Use for rectangle only (Northwest corner) () E or W				
23) Do you propose to operate in	an area th	at requires frequency	coordination with Cana	da? (N) Yes No		
24) Description: (only for Area of	Operation	Code 'O')	7				
25) Number of Units:	Hand Held	Mobile	_Temporary Fixed	AircraftItin	erant		
26) Would a Commission grant or environmental effect? See Se If 'Yes', submit an environme	ection 1.130	7 of 47 CFR.	3		N) Yes No		
27a) If the site is located in one of proper Quiet Zone entity was			7b of the Instructions, p	provide the date (mm/dd/yy	yy) that the		
27b) Has the Applicant obtained specified in this application?		n consent from the pro	per Quiet Zone entity fo	or the same technical para (meters that are) <u>Y</u> es <u>N</u> o		
28) Do you propose to operate in	an area th	at requires frequency	coordination with Mexic	00? () <u>Y</u> es <u>N</u> o		

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	<u>A</u> dd	<u>M</u> od <u>D</u> el	2) Location Number:	: 7			
Location Description: Mobile		4) Area of Operation	Code:	5) Location N	ame:		
6) FCC Antenna Structure Regis	tration # or	N/A (FAA Notification	not Required): N/A	<u> </u>			
7) Latitude (DD-MM-SS.S): 47-45-23.3		NAD83 (N) <u>N</u> or <u>S</u>	8) Longitude (DDD-N 090-20-29.1	MM-SS.S):	NAD83 (W) <u>E</u> or <u>W</u>		
9) Street Address, Name of Lanc 515 5TH AVE W	ding Area, o	or Other Location Desc	cription:				
10) City: GRAND MARAIS		11) State: MN		12) County/Bo COOK	orough/Parish:		
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):		15) Overall Ht AGL With Appurtenances (meters) ('c' in antenna structure example)			
16) Support Structure Type:							
17) Location Number: (only for Area of Operation Code 'A')	18) Radiu 12.0	s (km):	19) Airport Identifier:	20) Site Status:		
21) Maximum Latitude (DD-MM- Use for rectangle only (Northwest		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longitude (DDD-MM-SS.S): NAD83 Use for rectangle only (Northwest corner) () E or W				
23) Do you propose to operate in	an area th	at requires frequency	coordination with Cana	ada?	(Y)Yes No		
24) Description: (only for Area of	Operation	Code 'O')					
25) Number of Units:	Hand Held	Mobile	Temporary Fixed	Aircraft	Itinerant		
26) Would a Commission grant of environmental effect? See Se If 'Yes', submit an environme	ection 1.130	07 of 47 CFR.			nt (N) <u>Y</u> es <u>N</u> o		
27a) If the site is located in one of proper Quiet Zone entity wa			7b of the Instructions, p	provide the date	(mm/dd/yyyy) that the		
27b) Has the Applicant obtained specified in this application		n consent from the pro	per Quiet Zone entity f	or the same tech	nnical parameters that are () Yes No		
28) Do you propose to operate in	an area th	at requires frequency	coordination with Mexic	00?	() <u>Y</u> es <u>N</u> o		

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

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1) Action Requested: (A)	<u>A</u> dd	<u>M</u> od <u>D</u> el	2) Location Number	: 8		
3) Location Description: Mobile		4) Area of Operatio	n Code: 5) Location Name		ame:	
6) FCC Antenna Structure Regis	tration # or	N/A (FAA Notification	n not Required):			
7) Latitude (DD-MM-SS.S): 48-05-03.8		NAD83 (N) N or S	8) Longitude (DDD- 123-06-14.4	MM-SS.S):	NAD83 (W) <u>E</u> or <u>W</u>	
9) Street Address, Name of Lanc 503 N SEQUIM AVE	ding Area, o	or Other Location Des	scription:			
10) City: SEQUIM		11) State: WA		12) County/Bo		
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):		15) Overall Ht AGL With Appurtenances (meters) ('c' in antenna structure example):		
16) Support Structure Type:						
17) Location Number: (only for Area of Operation Code 'A')	18) Radiu 12.0	us (km):	19) Airport Identifier	20) Site Status:	
21) Maximum Latitude (DD-MM- Use for rectangle only (Northwest		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longitude (DDD-MM-SS.S): NAD83 Use for rectangle only (Northwest corner) () E or W			
23) Do you propose to operate in	an area th	at requires frequency	coordination with Cana	ada?	(Y) <u>Y</u> es <u>N</u> o	
24) Description: (only for Area of	Operation	Code 'O')				
25) Number of Units:	Hand Held	Mobile	Temporary Fixed	Aircraft	Itinerant	
26) Would a Commission grant of environmental effect? See Se If 'Yes', submit an environme	ection 1.130	07 of 47 CFR.			t (N) Yes No	
27a) If the site is located in one of proper Quiet Zone entity wa			27b of the Instructions,	provide the date	(mm/dd/yyyy) that the	
27b) Has the Applicant obtained specified in this application		n consent from the pr	oper Quiet Zone entity	for the same tech	nical parameters that are () <u>Y</u> es <u>N</u> o	
28) Do you propose to operate in	an area th	at requires frequency	coordination with Mexi	co?	() <u>Y</u> es <u>N</u> o	

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	<u>A</u> dd <u>M</u> od <u>D</u> el	2) Location Number	er: 9		
3) Location Description:	4) Area of Oper	ration Code:	5) Location Name:		
Mobile	P		76		
6) FCC Antenna Structure Registration	on # or N/A (FAA Notific	cation not Required): N/A			
7) Latitude (DD-MM-SS.S): 44-58-54.2	NAD83 (N) <u>N</u> or <u>S</u>	8) Longitude (DDD 093-28-57.6	o-MM-SS.S):	NAD83 (W) <u>E</u> or <u>W</u>	
9) Street Address, Name of Landing 305 VICKSBURG LANE	Area, or Other Location	Description:			
10) City:	11) State:		12) County/Boro	ugh/Parish:	
PLYMOUTH	MN		HENNEPIN		
13) Elevation of Site AMSL (meters) ('a' in antenna structure example): Appurtenar	14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):		GL With ces (meters) na structure example):	
16) Support Structure Type:					
17) Location Number: 18 (only for Area of Operation Code 'A')) Radius (km): :.0	19) Airport Identifie	er: 20) S	ite Status:	
21) Maximum Latitude (DD-MM-SS.S Use for rectangle only (Northwest corr			gitude (DDD-MM-SS. nly (Northwest corner)		
23) Do you propose to operate in an	area that requires freque	ency coordination with Car	nada?	(N)Yes No	
24) Description: (only for Area of Ope	eration Code 'O')				
25) Number of Units:Hand	d HeldMobile	Temporary Fixed	Aircraft	Itinerant	
26) Would a Commission grant of Au environmental effect? See Sectio If 'Yes', submit an environmental	n 1.1307 of 47 CFR.	59 90 9489 pa 10 0 10	9789 2/G (All II)	(N) Yes No	
27a) If the site is located in one of the proper Quiet Zone entity was no		em 27b of the Instructions	, provide the date (m	m/dd/yyyy) that the	
27b) Has the Applicant obtained prior specified in this application?	written consent from th	ne proper Quiet Zone entity	for the same technic	cal parameters that are () <u>Y</u> es <u>N</u> o	
28) Do you propose to operate in an	area that requires freque	ency coordination with Mex	xico?	() <u>Y</u> es <u>N</u> o	

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau 3060 - 0798 Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	<u>A</u> dd	<u>M</u> od <u>D</u> el	2) Location Number:	10	
3) Location Description:		4) Area of Operation	n Code:	5) Location Nam	e:
Mobile	Mobile P				
6) FCC Antenna Structure Regis	stration # or	N/A (FAA Notification	n not Required): N/A	1	
7) Latitude (DD-MM-SS.S): 40-01-31.2		NAD83 (N) N or S	8) Longitude (DDD-f 078-25-59.0	MM-SS.S):	NAD83 (W) <u>E</u> or <u>W</u>
9) Street Address, Name of Land 10455 LINCOLN HWY	ding Area, o	or Other Location Des	cription:		
10) City:		11) State:		12) County/Boro	ugh/Parish:
EVERETT		PA		BEDFORD	
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):		15) Overall Ht Ad Appurtenand ('c' in antenr	
16) Support Structure Type:					
17) Location Number: (only for Area of Operation Code 'A')	18) Radiu 20.0	us (km):	19) Airport Identifier:	20) S	ite Status:
21) Maximum Latitude (DD-MM- Use for rectangle only (Northwest		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longit Use for rectangle only		
23) Do you propose to operate in	n an area th	at requires frequency	coordination with Cana	ida?	(N) Yes No
24) Description: (only for Area of	f Operation	Code 'O')			
25) Number of Units:	Hand Held	Mobile	Temporary Fixed	Aircraft	Itinerant
26) Would a Commission grant of environmental effect? See So If 'Yes', submit an environment	ection 1.130 ental assess	07 of 47 CFR. sment as required by	47 CFR, Sections 1.130	98 and 1.1311.	(N) Yes No
27a) If the site is located in one of proper Quiet Zone entity was			27b of the Instructions, p	provide the date (m	m/dd/yyyy) that the
27b) Has the Applicant obtained specified in this application		n consent from the pro	oper Quiet Zone entity f	or the same technic	cal parameters that are () Yes No
28) Do you propose to operate in	n an area th	at requires frequency	coordination with Mexic	co?	() <u>Y</u> es <u>N</u> o

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau 3060 - 0798 Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	<u>A</u> dd	<u>M</u> od <u>D</u> el	2) Location Number	[‡] 11	
3) Location Description: Mobile		4) Area of Operation	n Code:	5) Location Nan	me:
6) FCC Antenna Structure Regis	tration # or	N/A (FAA Notificatio	n not Required): N/A		
7) Latitude (DD-MM-SS.S): 45-08-09.4		NAD83 (N) N or S	8) Longitude (DDD- 094-31-17.2	MM-SS.S):	NAD83 (W) <u>E</u> or <u>W</u>
9) Street Address, Name of Land 340 EAST 10TH STREET	ding Area, o	or Other Location Des	scription:		
10) City:		11) State:		12) County/Boro	ough/Parish:
LITCHFIELD		MN		MEEKER	
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):			AGL With nces (meters) nna structure example):
16) Support Structure Type:					
17) Location Number: (only for Area of Operation Code 'A')	18) Radiu 14.0	us (km):	19) Airport Identifier	20)	Site Status:
21) Maximum Latitude (DD-MM- Use for rectangle only (Northwest 		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longi Use for rectangle onl		
23) Do you propose to operate in	an area th	nat requires frequency	coordination with Cana	ada?	(N) <u>Y</u> es <u>N</u> o
24) Description: (only for Area of	Operation	Code 'O')			
25) Number of Units:I	Hand Held	Mobile	Temporary Fixed	Aircraft	Itinerant
26) Would a Commission grant of environmental effect? See Se If 'Yes', submit an environme	ection 1.13	07 of 47 CFR.	ALESS NO. 1		(N)Yes No
27a) If the site is located in one of proper Quiet Zone entity wa			27b of the Instructions,	provide the date (r	mm/dd/yyyy) that the
27b) Has the Applicant obtained specified in this application		n consent from the pr	oper Quiet Zone entity	for the same techn	ical parameters that are () Yes No
28) Do you propose to operate in	an area th	at requires frequency	coordination with Mexi	ico?	() <u>Y</u> es <u>N</u> o

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau 3060 - 0798 Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	<u>A</u> dd	<u>M</u> od <u>D</u> el	2) Location Number:	12	
3) Location Description: Mobile		4) Area of Operation Code:		5) Location Name	:
6) FCC Antenna Structure Regis	tration # or	N/A (FAA Notification	not Required): N/A		
7) Latitude (DD-MM-SS.S): 45-07-10.9		NAD83 (N)№ or <u>S</u>	8) Longitude (DDD-N 094-31-45.1	MM-SS.S):	NAD83 (W) <u>E</u> or <u>W</u>
9) Street Address, Name of Lanc 612 SOUTH SIBLEY AVENU		r Other Location Desc	ription:		
10) City: LITCHFIELD		11) State: MN		12) County/Borous	gh/Parish:
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):		15) Overall Ht AGL With Appurtenances (meters) ('c' in antenna structure example	
16) Support Structure Type:					
17) Location Number: (only for Area of Operation Code 'A')	18) Radius 14.0	s (km):	19) Airport Identifier:	20) Sit	e Status:
21) Maximum Latitude (DD-MM-S Use for rectangle only (Northwest		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longitu Use for rectangle only): NAD83 () <u>E</u> or <u>W</u>
23) Do you propose to operate in	an area th	at requires frequency	coordination with Cana	da?	(N) Yes No
24) Description: (only for Area of	Operation (Code 'O')			
25) Number of Units:h	Hand Held	Mobile	Temporary Fixed	Aircraft	Itinerant
26) Would a Commission grant or environmental effect? See Se If 'Yes', submit an environme	ection 1.130	7 of 47 CFR.		79 151409 49950 P	(N) <u>Y</u> es <u>N</u> o
27a) If the site is located in one of proper Quiet Zone entity was			7b of the Instructions, p	provide the date (mm	/dd/yyyy) that the
27b) Has the Applicant obtained specified in this application?		consent from the pro	per Quiet Zone entity fo	or the same technica	l parameters that are () Yes No
28) Do you propose to operate in	an area tha	at requires frequency	coordination with Mexic	xo?	() <u>Y</u> es <u>N</u> o

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	<u>A</u> dd	<u>M</u> od <u>D</u> el	2) Location Number:	13	
Location Description: Mobile		Area of Operation P	of Operation Code: 5) Location Name:		e:
6) FCC Antenna Structure Registr	ration # or	N/A (FAA Notification	not Required): N/A		
7) Latitude (DD-MM-SS.S): 45-04-26.6		NAD83 (N) N or S	8) Longitude (DDD-N 094-11-33.3	MM-SS.S):	NAD83 (W) <u>E</u> or <u>W</u>
9) Street Address, Name of Landi 200 5TH ST S W	ng Area, o	r Other Location Desc	I. cription:		
10) City: COKATO		11) State: MN		12) County/Borou WRIGHT	ıgh/Parish:
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):		15) Overall Ht AG Appurtenanc ('c' in antenn	
16) Support Structure Type:				1	
17) Location Number: (only for Area of Operation Code 'A')	18) Radius 12.0	s (km):	19) Airport Identifier:	20) Si	te Status:
21) Maximum Latitude (DD-MM-S Use for rectangle only (Northwest c		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longit Use for rectangle only		
23) Do you propose to operate in	an area th	at requires frequency	coordination with Cana	da?	(N) <u>Y</u> es <u>N</u> o
24) Description: (only for Area of 0	Operation (Code 'O')			
25) Number of Units:H	and Held	Mobile	Temporary Fixed	Aircraft	Itinerant
26) Would a Commission grant of environmental effect? See Sec If 'Yes', submit an environment	ction 1.130	7 of 47 CFR.			(N) <u>Y</u> es <u>N</u> o
27a) If the site is located in one of proper Quiet Zone entity was			7b of the Instructions, p	provide the date (mi	m/dd/yyyy) that the
27b) Has the Applicant obtained p specified in this application?		consent from the pro	per Quiet Zone entity for	or the same technic	al parameters that are () Yes No
28) Do you propose to operate in	an area tha	at requires frequency	coordination with Mexic	00?	() <u>Y</u> es <u>N</u> o

Wireless Telecommunications Bureau and/or Public Safety and Homeland Security Bureau Schedule for Station Locations and Antenna Structures See 601 Main Form Instructions

Approved by OMB 3060 - 0798

1) Action Requested: (A)	<u>A</u> dd	<u>M</u> od <u>D</u> el	2) Location Number	: 14		
3) Location Description:		4) Area of Operation	n Code:	5) Location Name:		
Mobile		Р				
6) FCC Antenna Structure Regist	tration # or	N/A (FAA Notification	n not Required): N/A			
7) Latitude (DD-MM-SS.S): 44-49-47.2		NAD83 (N) N or S	8) Longitude (DDD-1 093-19-53.4	MM-SS.S):	NAD83 (W) <u>E</u> or <u>W</u>	
9) Street Address, Name of Land 9700 FRANCE AVE S	ing Area, o	or Other Location Des	cription:			
10) City:		11) State:		12) County/Boro	ugh/Parish:	
MINNEAPOLIS		MN		HENNEPIN		
13) Elevation of Site AMSL (meters) ('a' in antenna structure example):		14) Overall Ht AGL Without Appurtenances (meters) ('b' in antenna structure example):			GL With ces (meters) na structure example):	
16) Support Structure Type:						
17) Location Number: (only for Area of Operation Code 'A')	ea of 16.0		19) Airport Identifier	20) \$	ite Status:	
21) Maximum Latitude (DD-MM-S Use for rectangle only (Northwest o		NAD83 () <u>N</u> or <u>S</u>	22) Maximum Longit Use for rectangle only			
23) Do you propose to operate in	an area th	nat requires frequency	coordination with Cana	ada?	(N) <u>Y</u> es <u>N</u> o	
24) Description: (only for Area of	Operation	Code 'O')				
25) Number of Units:H	land Held	Mobile	Temporary Fixed	Aircraft	Itinerant	
26) Would a Commission grant of environmental effect? See Se If 'Yes', submit an environment	ction 1.13	07 of 47 CFR.			(N) <u>Y</u> es <u>N</u> o	
27a) If the site is located in one o proper Quiet Zone entity was			27b of the Instructions,	provide the date (m	nm/dd/yyyy) that the	
27b) Has the Applicant obtained p specified in this application?		n consent from the pre	oper Quiet Zone entity f	for the same techni	cal parameters that are () <u>Y</u> es <u>N</u> o	
28) Do you propose to operate in	an area th	nat requires frequency	coordination with Mexic	co?	() <u>Y</u> es <u>N</u> o	

Technical Data Schedule for the Private Land Mobile and Land Mobile Broadcast Auxiliary Radio Services (Parts 90 and 74)

Approved by OMB 3060 - 0798 See 601 Main Form instructions for public burden estimate

Eligibility								
1) Rule Section	on:	2) Describe Activity:						
90.35			NT ARE LAWFULLY ENG KS TO THE PUBLIC.	GAGED IN THE C	OMMERCIAL A	ACTIVITY OF		
Frequency	Coordinator Info	rmation (if not self-coordin	nated)					
	3)		5)	6)				
	Coordination mber	Name of Freq	uency Coordinator	Telep	phone Number	Coordination Date		
PC2011356	0017	Personal Communication	ns Industry Associa	(703)739	-0300	12/28/2011		
7) Has this ap	plication been succ	essfully coordinated?		'		(Y)Yes/No		
Extended In	nplementation (S	Slow Growth)						
8) Are you red	uesting a new or m	odified extended implementati				(N)Yes/No		
ir Yes, and	ach an exhibit with a	a justification and a proposed	station construction schedule					
ssociated C	Call Signs (Attack	n additional sheets if requ	uired)					
)					1			
roadcast A	uxiliary Only							
there is an		10) Facility Id of Parent	11) Radio Service of		State of Parent S	Station Principal		
arent Statio ems 10-12.	n, complete	Station:	Parent Station:	Community:	Community:			
ems 10-12.								
3) If there is no	associated parent	station, this Applicant is a: ()		14) State of Prim	ary Operation:		
Cable Netwo	ork Entity Bro	adcast Network Entity Tele	vision Cable Operator					
Motion Pictu	re Producer Tele	vision Producer						
ontrol Point	t(s) (Other than a	nt the transmitter) (Attac	h additional sheets if red	quired)				
15)	16)	, , , , , , , , , , , , , , , , , , ,	17)	1/		18)		
Action	Control Point		Location			elephone		
A/M/D	Number	Street Address, C	City or Town, County/Borough	n/Parish, State		Number		
	4							

Antenna Information

19) Action () A/M/D	20) Location Number	21) Antenna Number	AAT (meters)	23) Antenna Ht. (meters)	24) Azimuth (degrees)	25) Beamwidth (degrees)	26) Polarization	27) Gain (dB)

Frequency Information

-reque	ncy Infor	mation								
28) Action () A/M/D	29) Location Number	30) Antenna Number	31 Frequen	I) cy (MHz)	32) Station Class	33) No. of Units	34) No. of Paging Receivers	35) Output Power (watts)	36) ERP (watts)	37) Emission Designators
A	3	1	Existing (if Mod) 000464.65000000	New	MO6	1		40.000	22.000	11K2F1D (A)
A	3	2	Existing (if Mod) 000464.65000000	New	MO6	1		10.000	13.000	11K2F1D (A)
\	4	1	Existing (if Mod) 000464.65000000	New	MO6	1		25.000	14.000	11K2F1D (A)
A	5	1	Existing (if Mod) 000464.65000000	New	MO6	1		10.000	13.000	11K2F1D (A)
A	6	1	Existing (if Mod) 000464.65000000	New	MO6	1		5.000	7.000	11K2F1D (A)
À.	7	1	Existing (if Mod) 000464.65000000	New	MO6	1		5.000	7.000	11K2F1D (A)
A	8	1	Existing (if Mod) 000464.65000000	New	MO6	1		5.000	7.000	11K2F1D (A)
A.	9	1	Existing (if Mod) 000464.65000000	New	MO6	1		5.000	7.000	11K2F1D (A)

29) Location Number	30) Antenna Number			32) Station Class	33) No. of Units	No. of Paging Receivers	35) Output Power (watts)	36) ERP (watts)	37) Emission Designators
10	1	Existing (if Mod) 000464.65000000	New	MO6	1		40.000	22.000	11K2F1D (A)
11	1	Existing (if Mod) 000464.65000000	New	MO6	1		10.000	7.000	11K2F1D (A)
12	1	Existing (if Mod) 000464.60000000	New	MO6	1		10.000	13.000	11K2F1D (A)
13	1	Existing (if Mod) 000464.65000000	New	MO6	1		5.000	7.000	11K2F1D (A)
14	1	Existing (if Mod) 000464.65000000	New	MO6	1		25.000	14.000	11K2F1D (A)
	Location Number 10 11 12	Location Number 10 1 11 1 12 1	Location Number Number Frequent	Location Number Antenna Number Frequency (MHz)	Location Number Antenna Number Frequency (MHz) Station Class 10 1 Existing (if Mod) New MO6 11 1 Existing (if Mod) New MO6 12 1 Existing (if Mod) New MO6 13 1 Existing (if Mod) New MO6 14 1 Existing (if Mod) New MO6	Location Number Number Frequency (MHz) Station Class No. of Units	Location Number Number Frequency (MHz) Station No. of Units Paging Receivers	Location Number Number Frequency (MHz) Station No. of Units No. of Paging Receivers Power (watts)	Location Number N

Attachment(s):

Туре	Description	Date Entered	
W	WAIVER REQUEST	12/28/2011	

AMERICAN TIME & SIGNAL CO. CALL SIGN WQFW336 EXHIBIT NO. 601-1

WAIVER REQUEST

Applicant American Time & Signal Co. (ATS) respectfully requests waiver of the definition of "mobile station" set forth in Section 90.7 of the Commission's rules, 47 C.F.R. §90.7, to the extent necessary to license ATS' SiteSync® and SiteSync IQ® transmitters as "MO6" sites on a primary basis under its radio station license Call Sign WQFW336.

ATS manufactures and sells wireless clock systems nationwide to schools, hospitals and other organizations operating in a large building or campus environment that have a need to synchronize numerous clocks spread throughout their premises. Internal transmitters at 5 and 10 watts are installed inside the System Controller (master clock) that transmit brief data signals periodically to associated clocks equipped with wireless receivers; and external transmitters at 25 and 40 watts are installed in enclosures separate from the System Controller that perform identical functions. The transmitters are attached either to magnetic mount 6 dBi gain or 26 inch fiberglass unity gain omnidirectional antennas. The transmitter(s) and antenna installations typically are deployed in the customer's headquarters or other campus building, usually at heights of 23 meters or less, and sometimes with "fill-in" transmitters to eliminate in-building or other gaps in signal coverage in the customer's premises.

WQFW336 authorizes ATS to operate FB6T stations nationwide, subject to certain restrictions north of Line A and east of Line C, on five frequencies in the 464.600 to 464.700 MHz band. ATS has hundreds of its wireless clock systems currently in operation pursuant to its license, and the number of such systems continues to grow over time. ATS initially believed, based on advices it received prior to applying for and being issued WQFW336, that the transmitters at its customer locations could be operated indefinitely under its license, due to the moveable nature of the transmitters utilized in its wireless clock systems and the fact that such transmitters may in fact be relocated over time due to signal coverage considerations or other changes in customer needs. Nonetheless, in order to resolve any questions concerning the appropriateness of its current licensing, ATS desires to specifically license its customer locations and requests that they be authorized as "MO6" sites on WQFW336.

The Commission has previously addressed the appropriateness of an MO6 license designation for multiple low power data transmitters, in circumstances identical to those presented by ATS' operations. See Amendment of Part 90 of the Commission's Rules and Policies for Applications and Licensing of Low Power Operations in the Private Land Mobile Radio 450-470 MHz Band (Report and Order), WT Docket No. 01-147, 18 FCC Rcd 3948, ¶¶17, 39 (FCC 2003)(the "Low Power R&O"). In that case, the Commission rejected the Land Mobile Communications Council's proposal that mobile-only data systems be prohibited in the 450-470 MHz low power band, finding that "providing coordinates for every fixed site would be

AMERICAN TIME & SIGNAL CO. CALL SIGN WQFW336 EXHIBIT NO. 601-1

an administrative burden for entities that operate numerous fixed sites throughout their service area" and concluding that "entities that operate data systems should be able to license multiple fixed sites as mobile." (Low Power R&O at ¶39). The Commission also recognized that providing site coordinates facilitates the frequency coordination process, and therefore stated that it "will continue to allow licensees who would like coordinators to consider their fixed operations in recommending frequencies for other applications to provide such coordinates." (Id. at ¶17.

ATS' wireless clock systems fit the same technical and operational profile as the fixed low power data systems which the Commission allows to be licensed as mobile sites in the Group A low power frequencies in the 450-470 MHz band. Similarly, too, having to license the numerous customer locations throughout its nationwide service area as fixed sites would be extremely burdensome administratively for ATS and its frequency coordinators, and physically could not be done under Call Sign WQFW336 due to the limit on sites per call sign imposed by ULS.

However, ATS is willing to provide the coordinates for the master transmitters at each customer location, and it is willing to accept a condition on grant of its requested waiver that it license each master transmitter as the centerpoint of its MO6 site at its customer's location. ATS is further willing to accept the condition that it maintain the accuracy of its licensed sites in the Commission's records. For this reason ATS believes that the waiver it requests offers significant public interest advantages over the Group A low power licensing requirements, in that (1) the location of each licensed master transmitter will be maintained in the Commission's data base on a current basis, thereby facilitating the frequency coordination process for other applicants and enabling the Commission to readily identify and locate master transmitters operating under WQFW336 in the unlikely event that harmful interference should occur; and (2) the maximum service area requested by ATS pursuant to this waiver request is 20 kilometers (for its 40 watt transmitters), in contrast to the 50 miles contemplated for Group A low power stations.

Section 1.925(b)(3)(ii) of the Commission's rules, 47 C.F.R. §1.925, provides that waiver may be granted on request, or on the Commission's own motion, in circumstances where application of specific requirements would be unduly burdensome. ATS respectfully submits that the Commission has already determined in the *Low Power R&O* that licensing each fixed site is unduly burdensome where entities such as ATS operate numerous fixed sites fitting the profile of low power data systems throughout their service area. ATS also respectfully submits that with the conditions proposed for grant of the waiver herein, the public interest in fostering interference free operations by licensees in the 464.600 to 464.700 MHz band will be fully served by licensing its customer locations as MO6 sites. Accordingly, ATS respectfully submits that the conditions for waiver set forth in Section 1.925 of the rules are fully satisfied, and that the waiver herein requested should be granted.